

January 9, 1995

ODESSA DRUM CO., Odessa, Ector Co. TX

FROM: Gregory E. Fife, Sr. OSC Region 6
TO: Charles Gazda, Chief, Emergency Response Branch
ERD

POLREP No.: 1

Site ID # Z2

Response Authority: CERCLA TXD 008012254

Action Memo Status: Signed July 11, 1994

Start Date: January 9, 1995

CERCLA incident category: Inactive waste management facility

SITE DESCRIPTION:

The Site is an abandoned drum reconditioner which operated from the early 1960s until 1990. Drums which were in poor condition and some drums containing hazardous wastes were thrown in a "bone yard". Over 100,000 drums were left onsite when the PRPs abandoned the site. While many are empty, the EPA removal action conducted in 1990-1991 removed approximately 6,000 drums and 5 large tanks containing hazardous waste. Those 6,000 drums were the drums that obviously contained material either from the result of the drums cleaning when the facility was active or the improper waste disposal actions.

Description of Threat:

Corrosive, and organic materials, and heavy metal contaminated waste have been found in the drums and soil onsite. The site is surrounded by residential properties and the threats of direct contact, ingestion and inhalation are significant for anybody entering the site. The drums come from a variety of sources but predominantly the oil field. A significant quantity of that material is flammable. The poor condition of the drums and the haphazard stacking could result in incompatible materials coming into contact with each other causing a reaction and potential fire. The resulting plume could then carry contamination over a wide area of residential and commerce properties.



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SITUATION:

Current Situation:

Over 100,000 drums are stacked on the 10 acre site. A removal action is underway which will remove and properly dispose of the drums and their contents. Upon completion of this phase, the extent of contamination will be determined and contaminated soil will be excavated and disposed of.

Removal Actions to Date:

The contractor selected for the drum removal phase has begun the mobilization to the site. Rivas Environmental Consultants is under a site specific contract to conduct the work. It is anticipated that this phase will take 12 to 18 months.

Enforcement:

An agreement was reached with over 130 de minimus parties to cashout for their allocated share of past and future costs. A similar agreement is being sought with the remaining 8 major PRPs. These monies are funding the current removal action.

Planned Removal Actions:

PHASE

- | | |
|-----|---|
| I | Removal and dispose of all drums and their contents |
| II | Determine extent of soil contamination |
| III | Excavate and dispose of contaminate soil |

NEXT STEPS:

Upon completion of the mobilization the Contractor will be removing, crushing and recycling the drums. Drums with contents will be separated for future identification when a significant quantity is amassed.

KEY ISSUES:

The contractor performing the work is working under a site specific contract rather than the standard Emergency Response Cleanup Services (ERCS) contractor. Significant savings in the funds both extramural and intramural are expected. The contract was put in place with the assistance of the Small Business Administration. The contractor, Rivas Environmental Consultants,

is a small disadvantaged, minority owned business or 8(a) firm. The portion of the Advice of Allowance for extramural contracts in the Removal program in Region 6 going into this contract represents approximately 20% far more than Administrator Browner's goal of 8%.

COST INFORMATION:

No cost to date

DISPOSITION OF WASTE:

No disposal to date.